

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

In re:	Case No. 19-34574-KRH
LeClairRyan, PLLC, <sup>1</sup>	
Debtor	Chapter 7

**PROPOSED AGENDA FOR HEARING ON  
MARCH 08, 2022, AT 11:00 A.M. (PREVAILING EASTERN TIME)**

Set forth below are the matters scheduled to be heard before the Honorable Kevin R. Huennekens, United States Bankruptcy Judge, in Room 5000, United States Courthouse, 701 East Broad Street, Richmond, Virginia 23219, on March 08, 2022, beginning at 11:00 a.m. via Zoom:

**Zoom registration link:**

Zoom registration link:

[https://www.zoomgov.com/meeting/register/vJlsc-iqrj8uGWaq-au2VsvsuoM6qZIGb\\_w](https://www.zoomgov.com/meeting/register/vJlsc-iqrj8uGWaq-au2VsvsuoM6qZIGb_w)

Listen-only conference line:

Dial: 1-866-590-5055

Access Code: 4377075

Security Code: 3822

1. Adversary Proceeding No. 20-03142 (ULX Partners, LLC, UnitedLex Corporation) - Motion to File Document(s) Under Seal (Re: related document(s)[147](#) Motion to Amend filed by Lynn L. Tavenner, as Chapter 7 Trustee, Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit A # [2](#) Exhibit B) (Morabito, Erika) [ECF No. 160]

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<sup>1</sup> The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor's federal tax identification number are 2451.

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Paula S. Beran, Esquire (Va. Bar No. 34679)  
Tavenner & Beran, PLC  
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Related documents:

- a. Notice of Motion and Notice of Hearing (Re: related document(s)[160](#) Motion to File Documents(s) Under Seal filed by Lynn L. Tavenner, as Chapter 7 Trustee, Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. Hearing scheduled for 3/8/2022 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Morabito, Erika) [ECF No. 161]
- b. See item #3 below for other related documents.

Response Deadline: March 1, 2022

Responses Filed: None

Status: Per the Judicial Mediator appointed by Court order entered on February 4, 2022 [ECF No. 142], the parties understand that this matter is being continued. The parties shall however appear before the Court for a status conference.

2. Adversary Proceeding No. 20-03142 (ULX Partners, LLC, UnitedLex Corporation) - Motion to File Document(s) Under Seal (Re: related document(s)[169](#) Sealed Document filed by ULX Partners, LLC, UnitedLex Corporation, ULX Manager LLC) filed by Thomas John McKee Jr. of Greenberg Traurig on behalf of ULX Manager LLC, ULX Partners, LLC, UnitedLex Corporation. (Attachments: # [1](#)Proposed Order) (McKee, Thomas) [ECF No. 170]

Related documents:

- a. Notice of Hearing (Re: related document(s)[170](#) Motion to File Documents(s) Under Seal filed by ULX Partners, LLC, UnitedLex Corporation, ULX Manager LLC) filed by Thomas John McKee Jr. of Greenberg Traurig on behalf of ULX Manager LLC, ULX Partners, LLC, UnitedLex Corporation. Hearing scheduled for 3/8/2022 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (McKee, Thomas) [ECF No. 171]
- b. See item #3 below for other related documents.

Status: Per the Judicial Mediator appointed by Court order entered on February 4, 2022 [ECF No. 142], the parties understand that

this matter is being continued. The parties shall however appear before the Court for a status conference.

3. Adversary Proceeding No. 20-03142 (ULX Partners, LLC, UnitedLex Corporation) - Motion to Amend *First Amended Complaint* (Re: related document(s)[86](#) Amended Complaint filed by Lynn L. Tavenner, as Chapter 7 Trustee, Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit A) (Morabito, Erika) [ECF No. 147]

Related documents:

- a. Notice of Hearing (Re: related document(s)[147](#) Motion to Amend filed by Lynn L. Tavenner, as Chapter 7 Trustee, Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. Hearing scheduled for 3/8/2022 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. (Morabito, Erika) [ECF No. 148]
- b. Adversary case 20-03142. Complaint against ULX Partners, LLC, UnitedLex Corporation (Fee Amount of \$350 is Deferred) filed by Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit 1 # [2](#) Exhibit 2 # [3](#) Exhibit 3 # [4](#) Exhibit 4 # [5](#) Exhibit 5 # [6](#) Exhibit 6 # [7](#) Exhibit 7 # [8](#) Exhibit 8 # [9](#) Exhibit 9 # [10](#) Exhibit 10 # [11](#) Exhibit 11 # [12](#) Exhibit 12 # [13](#) Exhibit 13 # [14](#) Exhibit 14 # [15](#) Exhibit 15 # [16](#) Exhibit 16 # [17](#) Exhibit 17 # [18](#) Exhibit 18 # [19](#) Exhibit 19 # [20](#) Exhibit 20 # [21](#) Exhibit 21 # [22](#) Exhibit 22 # [23](#) Exhibit 23 # [24](#) Exhibit 24 # [25](#) Exhibit 25 # [26](#) Exhibit 26 # [27](#) Exhibit 27 # [28](#) Exhibit 28) Nature of Suit: (13 (Recovery of money/property - 548 fraudulent transfer)), (12 (Recovery of money/property - 547 preference)), (21 (Validity, priority or extent of lien or other interest in property)) Associated Bankruptcy Case Number: 3:19-bk-34574 (Morabito, Erika) [ECF No. 1]
- c. Amended Complaint against ULX Manager LLC, Gary LeClair, ULX Partners, LLC, UnitedLex Corporation (Re: related document(s)[1](#) Complaint filed by Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit 1 # [2](#) Exhibit 2 # [3](#) Exhibit 3 # [4](#) Exhibit 4 # [5](#) Exhibit 5) (Morabito, Erika) [ECF No. 86]
- d. Joint Stipulation for Dismissal of Defendant Gary LeClair By Lynn L. Tavenner, as Chapter 7 Trustee and Between filed by Brittany Jane Nelson of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Nelson, Brittany) [ECF No. 130]

- e. Sealed Motion/Application(Re: related document(s)[147](#) Motion to Amend filed by Lynn L. Tavenner, as Chapter 7 Trustee, Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # [1](#) Exhibit A) (Morabito, Erika) [ECF No. 149]
- f. Sealed Answer/Response/Reply(Re: related document(s)[147] Motion to Amend filed by Lynn L. Tavenner, as Chapter 7 Trustee, Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Morabito, Erika) [ECF No. 173]
- g. Reply to Motion to Amend First Amended Complaint (Re: related document(s)[173] Sealed Document filed by Lynn L. Tavenner, as Chapter 7 Trustee, Lynn L. Tavenner, as Chapter 7 Trustee) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Attachments: # (1) Exhibit 1 # (2) Exhibit 2 # (3) Exhibit 3 # (4) Exhibit 4 # (5) Exhibit 5 # (6) Exhibit 6 # (7) Tab A # (8) Tab C) (Morabito, Erika) [ECF No. 174]
- h. Sealed Exhibit(Re: related document(s)[168] Response to Motion/Application filed by ULX Partners, LLC, UnitedLex Corporation, ULX Manager LLC) filed by Erika L. Morabito of Quinn Emanuel on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. (Morabito, Erika) [ECF No. 175]

Response Deadline: March 1, 2022

Responses Filed: Response to (Re: related document(s)[147](#) Motion to Amend filed by Lynn L. Tavenner, as Chapter 7 Trustee, Lynn L. Tavenner, as Chapter 7 Trustee) filed by Thomas John McKee Jr. of Greenberg Traurig on behalf of ULX Manager LLC, ULX Partners, LLC, UnitedLex Corporation. (Attachments: # 1 Exhibit(s) A # 2Exhibit(s) B # 3 Exhibit(s) C # 4 Exhibit(s) D # 5 Exhibit(s) E # 6 Exhibit(s) F # 7Exhibit(s) G # 8 Exhibit(s) H # 9 Exhibit(s) I # 10 Exhibit(s) J # 11 Exhibit(s) K # 12 Exhibit(s) L # 13 Exhibit(s) M) (McKee, Thomas) [ECF No. 168]

Sealed Answer/Response/Reply (Re: related document(s)[147](#) Motion to Amend filed by Lynn L. Tavenner, as Chapter 7 Trustee, Lynn L. Tavenner, as Chapter 7 Trustee) filed by Thomas John McKee Jr. of Greenberg Traurig on behalf of ULX Manager LLC, ULX Partners, LLC, UnitedLex Corporation. (Attachments: # 1 Exhibit(s) A # 2 Exhibit(s) B # 3 Exhibit(s) C # 4 Exhibit(s) D # 5 Exhibit(s) E # 6 Exhibit(s) F # 7Exhibit(s) G # 8 Exhibit(s) H # 9 Exhibit(s) I # 10 Exhibit(s) J # 11

Exhibit(s) K # 12 Exhibit(s) L # 13 Exhibit(s) M) (McKee, Thomas) [ECF No. 169]

Status: Per the Judicial Mediator appointed by Court order entered on February 4, 2022 [ECF No. 142], the parties understand that this matter is being continued. The parties shall however appear before the Court for a status conference.

Respectfully submitted,

**LYNN L. TAVENNER, CHAPTER 7 TRUSTEE**

Dated: March 6, 2022  
Richmond, Virginia

By: /s/ Paula S. Beran  
Paula S. Beran, Esquire (VSB No. 34679)  
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*Counsel for Lynn L. Tavenner, Chapter 7 Trustee*

**CERTIFICATE OF SERVICE**

Pursuant to the Local Rules of this Court and applicable orders, I certify that on this 6th day of March 2022, a true copy of the foregoing Agenda was sent electronically to all parties receiving ECF notices in this Case.

/s/ Paula S. Beran  
*Counsel for Lynn L. Tavenner, Chapter 7 Trustee*